

SHOOK, HARDY & BACON LLP

B. Trent Webb, Esq. (*pro hac vice*)

Peter Strand Esq. (*pro hac vice*)

Ryan D. Dykal Esq. (*pro hac vice*)

2555 Grand Boulevard

Kansas City, Missouri 64108-2613

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

[bwebb@shb.com](mailto:bwebb@shb.com)

Robert H. Reckers, Esq. (*pro hac vice*)

600 Travis Street, Suite 3400

Houston, Texas 77002

Telephone: (713) 227-8008

Facsimile: (731) 227-9508

[rreckers@shb.com](mailto:rreckers@shb.com)

GREENBERG TRAURIG

Mark G. Tratos, Esq. (Nevada Bar No. 1086)

Brandon Roos, Esq. (Nevada Bar No. 7888)

Leslie Godfrey, Esq. (Nevada Bar No. 10229)

3773 Howard Hughes Parkway

Suite 400 North

Las Vegas, NV 89169

Telephone: (702) 792-3773

Facsimile: (702) 792-9002

[tratosm@gtlaw.com](mailto:tratosm@gtlaw.com)

[roosb@gtlaw.com](mailto:roosb@gtlaw.com)

[godfrey1@gtlaw.com](mailto:godfrey1@gtlaw.com)

LEWIS ROCA ROTHGERBER LLP

W. West Allen (Nevada Bar No. 5566)

3993 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169

Tel: (702) 949-8200

Fax: (702) 949-8398

[WAllen@LRRLaw.com](mailto:WAllen@LRRLaw.com)

*Attorneys for Defendants*

*Rimini Street, Inc., and Seth Ravin*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANTS' MOTION FOR  
LEAVE TO FILE UNDER SEAL  
PORTIONS OF DEFENDANTS'  
OPPOSITION TO ORACLE'S  
MOTION TO RE-DESIGNATE  
RIMINI'S 2006-2011 CUSTOMER  
LIST**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010 (*See* Dkt. 55, "Protective Order"), Local Rule 10-5(b) and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Defendants Rimini Street, Inc. and Seth Ravin ("Rimini") respectfully requests that the Court grant leave to file under seal portions of the Opposition to Oracle's Motion To Re-Designate Rimini's 2006-2011 Customer List and exhibits

1 thereto, and the Declaration of Robert Lachs in support of Defendants' Opposition to Oracle's  
2 Motion To Re-Designate Rimini's 2006-2011 Customer List. A public redacted version of the  
3 Opposition to Oracle's Motion to Re-Designate Rimini's 2006-2011 Customer List, and the  
4 Declaration of Robert Lachs in support of Defendants' Opposition to Oracle's Motion to Re-  
5 Designate Rimini's 2006-2011 Customer List were filed on August 24, 2015. Additionally, on  
6 August 24, 2015, the unredacted versions of the Opposition to Oracle's Motion To Re-Designate  
7 Rimini's 2006-2011 Customer List, and the Declarations of Robert Lachs in support of Defendants'  
8 Opposition to Oracle's Motion to Re-Designate Rimini's 2006-2011 Customer List was filed on  
9 August 24, 2015 were filed under seal.

10       The Court has "broad latitude" under Rule 26(c) "to prevent disclosure of materials for many  
11 types of information, including, but not limited to, trade secrets or other confidential research,  
12 development, or commercial information." *Phillips v. Gen. Motors Corp.*, 307 F.3d 1206, 1211 (9th  
13 Cir. 2002) (citations omitted). Sealing portions of Defendants' Opposition to Oracle's Motion To  
14 Re-Designate Rimini's 2006-2011 Customer List, and the Declaration Robert Lachs in support of  
15 Defendants' Opposition to Oracle's Motion To Re-Designate Rimini's 2006-2011 Customer List is  
16 requested because these documents contains includes information regarding Oracle's contact with  
17 Rimini's customers, portions of Rimini's Support Services Agreement that detail confidential  
18 language, and information gained during negotiations with new and potential Rimini customers.  
19 Disclosure of this information would competitively harm Rimini, and its abilities to negotiate with  
20 potential customers.

21       Rimini has submitted all other portions of Defendants' Opposition to Oracle's Motion To Re-  
22 Designate Rimini's 2006-2011 Customer List, and the Declaration of Robert Lachs in support of  
23 Defendants' Opposition to Oracle's Motion to Re-Designate Rimini's 2006-2011 Customer List, for  
24 filing in the Court's public files, which would allow public access to the filings except for the  
25 documents Rimini has designated as Highly Confidential. Accordingly, the request to seal is  
26 narrowly tailored.

27       For the foregoing reasons, Rimini respectfully requests that the Court grant leave to file  
28 portions of Defendants' Opposition to Oracle's Motion To Re-Designate Rimini's 2006-2011

1 Customer List (and exhibits), and the Declaration of Robert Lachs in support of Defendants'  
2 Opposition to Oracle's Motion to Re-Designate Rimini's 2006-2011 Customer List under seal.

3  
4 DATED: August 24, 2015

LEWIS ROCA ROTHGERBER LLP

5  
6 By: /s/ W. West Allen \_\_\_\_\_  
7 W. West Allen

8 *Attorneys for Defendants*  
9 *Rimni Street, Inc. and Seth Ravin*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of August, 2015, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, District of Nevada, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

BOIES, SCHILLER & FLEXNER LLP  
 RICHARD J. POCKER (NV Bar No. 3568)  
 300 South Fourth Street, Suite 800  
 Las Vegas, NV 89101  
 Telephone: (702) 382-7300  
 Facsimile: (702) 382-2755  
[rpocker@bsflp.com](mailto:rpocker@bsflp.com)

BOIES, SCHILLER & FLEXNER LLP  
 STEVEN C. HOLTZMAN (*pro hac vice*)  
 FRED NORTON (*pro hac vice*)  
 KIERAN P. RINGGENBERG (*pro hac vice*)  
 1999 Harrison Street, Suite 900  
 Oakland, CA 94612  
 Telephone: (510) 874-1000  
 Facsimile: (510) 874-1460  
[sholtzman@bsflp.com](mailto:sholtzman@bsflp.com)  
[fnorton@bsflp.com](mailto:fnorton@bsflp.com)  
[kringgenberg@bsflp.com](mailto:kringgenberg@bsflp.com)

MORGAN, LEWIS & BOCKIUS LLP  
 THOMAS S. HIXSON (*pro hac vice*)  
 KRISTEN A. PALUMBO (*pro hac vice*)  
 NITIN JINDAL (*pro hac vice*)  
 JOHN A. POLITO (*pro hac vice*)  
 One Market, Spear Street Tower  
 San Francisco, CA 94105-1596  
[thomas.hixson@morganlewis.com](mailto:thomas.hixson@morganlewis.com)  
[kristen.palumbo@morganlewis.com](mailto:kristen.palumbo@morganlewis.com)  
[Nitin.jindal@morganlewis.com](mailto:Nitin.jindal@morganlewis.com)  
[John.polito@morganlewis.com](mailto:John.polito@morganlewis.com)

ORACLE CORPORATION  
 DORIAN DALEY (*pro hac vice*)  
 DEBORAH K. MILLER (*pro hac vice*)  
 JAMES C. MAROULIS (*pro hac vice*)  
 500 Oracle Parkway  
 M/S 5op7  
 Redwood City, CA 94070  
 Telephone: 650.506.4846  
 Facsimile: 650.506.7114  
[jim.maroulis@oracle.com](mailto:jim.maroulis@oracle.com)

LEWIS ROCA ROTHGERBER LLP

By: /s/ Judy Estrada